Additional comments of Larry Langford on NPRM 07-172

Larry Langford is the Licensee of WGTO AM and WDOW AM in Cass County Michigan. Langford has filed other comments on these proceedings.

One area that has not received a lot of notice is the fact that the NAB petition does not address the power limitation of the translators that would be licensed for use by AM stations.

The assumption is the current power limit of 250 watts would be used. This however does not lend itself to the best use of spectrum. Many AM stations have a substantial area within the DAY 2 millivolt contour and covering that contour with translators of limited power would require multiple sites and frequencies. I believe it is far more efficient to allow a single site with higher power. Often the AM tower site will prove to be ideal at higher power levels. Using COMSTUDY 2.0 I plotted the 60 dbu contour of a translator operating at an ERP of 1 KW using a single bay at

the top of one of my WGTO towers. The 60 dbu contour almost duplicates the 2 millivolt day coverage of WGTO without exceeding the 2 millivolt contour even on the weak side of the pattern.

The NPRM should allow or make it clear if this would be an acceptable use of the translator. This pattern assumes the translator antenna is mounted near the top of one of the AM towers. (about 80 meters)

I plotted the same for WDOW which operates at 1440 khz with a 48 meter tower. At this level an ERP of .7 KW closely matches the 2 millivolt contour of the AM station.

Again the question is raised is this a more efficient use of the spectrum than to have several lower powered transmitters to cover the same area.? While this may not be as serious a matter for stations at the upper end of the AM dial, it is of serious concern to stations at the lower end. There is a substantial difference in

footprint for a station at 910 versus one at 1440.

I submit that higher powers are needed to more effectively cover the day foot print of most AM stations. Higher power will also lead to a larger secondary area that would serve the public better than smaller secondary achieved with multiple transmitters and make AM tower mounting practical.